



January 25, 2002

Southern Forest Resource Assessment  
USDA Forest Service  
1720 Peachtree Road NW  
Atlanta, GA 30309

Dear Sirs:

Here are my comments on the summary report of the Southern Forest Assessment.

2.3 Timber Markets – (bottom of page 13 and top of page 14)

You make a statement that “change in pulping technology has allowed hardwoods to be substituted for more expensive softwood in the manufacturing of paper products.” This is certainly not the case in our area of Southwest Alabama and Southeast Mississippi. Paper companies are using hardwoods because they have to have hardwood fiber to make the paper product they manufacture. Hardwood pulpwood presently brings \$2.00 to \$6.00 per ton more delivered to paper mills than does pine. I think you will find this to be the case over a broad area of the south at the present time.

In the Preface of page 2 you referred to an “increasing timber demand”. The demand is not for “Timber” all-inclusive but for selective types and grades suitable for specific products.

In our area the demand for pine pulpwood has steadily declined since 1997. This was brought about by the increased acreage of plantations becoming merchantable and due to pulp and paper mills closing down. Stumpage price for pine pulpwood is about 50 percent of the 1997 price.

Also, you state in the preface that there are “increasing numbers of satellite chip mills” but yet in Section 2.3 Timber Markets top of page 17 you present data that shows a drop in chips produce by offsite chip mills.

2.4 Social Institutions page 17 A permanent change in inheritance taxes would encourage better management and longer rotations. Allowing all reforestation cost or a very high level to be expensed instead of capitalized would do wonders for improved management on private land.

Top of page 18 "Direct regulation of forestry is limited in the rural south". There is direct correlation between this statement and the paragraph that follows. The private forest owner in the south does a good job of growing timber for the woods products industry; as well as protecting water quality and managing desirable wildlife habitat. They do an excellent job of multiple use management because it pays to be good stewards of the land. Regulations are not needed and would be counter productive.

205 Biological Factors – Epidemic infestations of southern pine beetle in the southern pine forest, natural or planted, is indicative of poor stand management. A pine stand that is thinned often and kept in a healthy condition is very resistant to southern pine beetle. You may have some small scattered beetle infestations of less than ½ acre. Proper management to "prevent" a beetle epidemic is better than attempting a "cure" after poor management creates the problem.

3.1.1 Social context on page 29 – Apparently you did not distinguish between people who own timberland and those who do not in your "social" questions concerning the use and management of forest land. The majority of private timber landowners are very concerned about "conservation" in its true meaning of "wise use" of the total forest resource. Timberland owners in general are very conservation oriented.

3.1.3 Wood Products on page 35 – You make the statement that "pine plantations are forecast to be managed for short rotation timber production." I question the accuracy of this forecast considering the very low demand and low price for pine pulpwood. The economics of short (less than 25 years) fiber rotations will not justify the expenditure of plantation establishment in today's pine pulpwood market. A lot of plantations are being established on non-paper company lands that are planned for 35 – 50 year rotations. Most private non-paper company owners are very anti short rotation forestry simply due to the economics. As you move up the rotation age to solid wood products the unit values increase dramatically. Chip-N-Saw is approximately 3 – 4 times the value of pine pulpwood and larger sawtimber is 6 – 8 times the value of pulpwood while poles may be 10 – 15 times the values of pulpwood.

3.1.4 Recreation on page 40 – 41 – On page 41 you make the statement that "Forest – based recreation is largely concentrated on relatively scarce public land." Also, that "only 7 percent of private land held by individuals is open to the public." It appears to me that you have too narrowly defined forest-based recreation. Most private land held by individuals is used for recreation purposes either by invitees or by the lessee. Lots of private land is leased by individuals or groups for hunting, fishing, ATV riding, horseback riding, camping, picnicking, etc. Just because only 7 percent are open to free access by any member of the public does not mean that the other 93 percent are not used for recreation purposes. Recreation leases provide significant income for many landowners and provides a monetary inducement for them to practice multiple use management. If your survey indicates that there are not enough developed picnic and camp sites open to free access by any member of the public, then I suggest that more be built on National Forest land. The contribution that National Forest provides

the public in the area of commercial timber production to be of no practical consequence. Perhaps the National Forest could provide some public value by providing more recreation opportunities for the non-land owning public.

3.2.1- Forest Area and Ownership on page 45 – I failed to find in answer to your related question Socio – 4 “what motivates private forest landowners to manage their forest land and how are their management objectives formed?” Financial return motivates private forest landowners to manage their forestland. There is a very simple straightforward correlation between return on investment in forestland and the level of forest management. Provide for the possibility of an increase in monetary return and you will see a commensurate increase in the level of forest management.

3.2.5 - Timberland Productivity on page 56 – You make a statement that plantations under intensive management can yield about 65 percent more “timber volume” when compared to plantations not intensively managed and more than double “physical productivity” when compared to natural pine stands. I do not question the validity of your statement as worded but I do question the implication that individual private land owners are primarily concerned with increasing “Timber Volume” or “Physical Productivity”. Most individual private timberland owners are concerned about “net dollar yield”. They are more inclined to analyze silvicultural treatments by net dollar yield after management cost than by the amount of increase in physical growth.

3.3.1.1 – Pine Types on page 60 – you seem to draw the conclusion that planting will regenerate the pine type and that the resulting plantations will be managed to maximize fiber production over a short rotation. There will be lots of exceptions. Natural regeneration will be very important in establishing new pine stands on private individual ownerships. As stated earlier, individuals are not generally inclined to manage on a short rotation. Most individual private landowners prefer to manage for natural regeneration and will clear cut and plant only when suitable natural regeneration is not a reasonable choice.

On page 61 – you refer to “exotic plant” pests. You include Japanese honeysuckle along with kudzu. Japanese honeysuckle is easy to control and does not provide any problem in establishment or management of pine stands. Kudzu, privet, cogon grass, wisteria, bacha and popcorn tree are some very severe pest that has to be controlled before you can establish a pine stand.

On page 63 – you state that “mature pine trees are more susceptible to damage from Southern pine beetle than younger trees”. This statement is true, but stocking seems to have more to do with susceptibility than does age up to 70 – 90 years. Overly dense young stands (120 – 160 BA) are more susceptible to SPB than older stands that are less dense (60 – 90 BA).

3.3.4 Effects of forest management on page 69 – In the second paragraph you end a short discussion on plantation use by wildlife with this sentence “After canopy closure, plant diversity generally decreases and wildlife use declines.” This is certainly true, but the problem can be alleviated with burning and

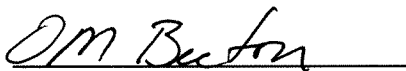
thinnings. Assuming a longer rotation, burning on 2 – 3 year interval before first thinning and then thin on 4 – 6 year interval up to age 30 with 2 prescribe burns in between each cut provides a good game habitat. After age 30 thinning would be 6 – 10 years apart with 2 – 3 burns in between each cut. At the top of page 70 you refer to a mid-rotation thinning. Certainly you would need more than one thinning in the middle of the rotation to maintain a healthy growth rate in a continuously well stocked stand.

4.1 – Broad Findings on page 86 – At the bottom of page 86 you state that “recreational access to private land is expected to continue to decrease.” There certainly is not much private land that provides free access to the public but there is a lot of “paid for” recreation use of private land. This recreational use of private land should be acknowledged as providing significant recreational opportunities for those willing to pay for the privilege.

Should there be a need for more free to the public recreation areas, then these areas should be provided on land that is presently in public ownership.

4.3 – Implications for ongoing programs. – There is a lot of information available on intensive management for pine plantations. This information is good and is based upon solid research, but the majority of private individual timberland owners will not implement this type management. A management system that results in a more naturally appearing forest is more appealing to the private individual timberland owner.

Get in touch with me if you have any questions.



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